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Via ECF, Email, and United States Postal Service First Class Mail

To: Hon. Loretta A. Preska, USDJ
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 1007

Re: *Manta Industries, Ltd. v. Paul P. Law, et al.*, Case No. 16-cv-8308

Re: Status of the Action, Remaining Claims, and Defendants

Dear Judge Preska:

I represent Plaintiff Manta Industries, Ltd. This is a fraudulent transfer case. Plaintiff alleges defendants fraudulently transferred hundreds of thousands of dollars of cash to themselves after a multi-million dollar judgment was entered by this Court against several of their business entities.

Now there is a pending Rule 37 motion filed by plaintiff against one family group of defendants: Yogesh Monhan Anand, his wife, Kum S. Casanova, and his son, Jonathan Anand. The basis for the motion is a total failure to respond to any discovery. Now, plaintiff requests this Court's permission to file another Rule 37 motion against the remaining family group of defendants: Paul Law and his wife, Lourdes Law. They, too, have totally failed to respond to discovery requests. This Court has entered multiple orders directing the Laws to respond to discovery requests and, in one order, Mr. Law was told to appear for a deposition and answer questions. So far, the Laws have produced no documents. Moreover, Mr. Law did not show up for his court ordered deposition.

If the Court allows the second Rule 37 motion, plaintiff will request that all the defendants' answers be stricken, and that default be entered against all of them on the issue of liability, leaving the issues of damages against all defendants to be decided at an evidentiary hearing.

I propose the following Local Civil Rule 6.1 briefing schedule:

- Plaintiff's Rule 37 motion shall be filed on or before October 17, 2023.
- Defendants' responses shall be filed within seven days after Plaintiff's motion is filed.
- Plaintiff's reply shall be filed within two days after Plaintiff's responses are filed.

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

Yours truly,

/s/B. Shamus O'Donniley

9/28/23

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